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Hearing Date: December 3, 2008
Hearing Time: 10:00 a.m.
Objection Date: November 26, 2008

Counsel for International Business Machines Corporation

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	
)	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., et al.)	
)	Case No. 08-13555 (JMP)
Debtor,)	
)	Jointly Administered
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SECURITIES INVESTOR PROTECTION)	
CORPORATION,)	
)	
Plaintiff,)	
)	Adversary Proceeding No.
v.)	08-01420 (JMP)
LEHMAN BROTHERS INC.)	
)	
Debtor.)	
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NOTICE OF WITHDRAWAL OF MOTION

PLEASE TAKE NOTICE that the motion of International Business Machines Corporation (“IBM”) for an Order (I) Compelling Payment of Undisputed Portion of Cure Amount; (II) Compelling Payment for Services Provided Post-Petition; and (III) Scheduling a Hearing for this Court to Determine the Amount of Remaining Disputed Cure Amount (the “Motion”) (ECF Docket #1286 in Case No. 08-13555 and #193 in Adv. Proc. No. 08-01420), currently pending before this Court, is hereby withdrawn. This withdrawal is without prejudice and IBM reserves its rights to seek judicial intervention pursuant to the “Order Under 11 U.S.C.

§§ 105(a), 363, and 365 and Federal Rules of Bankruptcy Procedure 2002, 6004 and 6006
Authorizing and Approving (A) the Sale of Purchased Assets Free and Clear of Liens and Other
Interests and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases”
(ECF Docket #258).

Dated: New York, New York
November 19, 2008

SATTERLEE STEPHENS BURKE & BURKE LLP
*Counsel for International Business Machines
Corporation*

By: /s/ Christopher R. Belmonte
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